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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JAY SHRAGER, an individual; CAROLE B.  
13 SHRAGER, an individual,

14 Plaintiffs,

15 vs.

16 BSI FINANCIAL SERVICES an unknown  
17 business entity; DOES I-X, inclusive, ROE  
CORPORATIONS I-X, inclusive,

18 Defendants.

19  
20 **CASE NO.: 2:16-cv-02039**

21  
22 **JOINT STIPULATION AND ORDER TO  
STAY PROCEEDINGS UNTIL JANUARY 5,  
2017**

23  
24 Plaintiffs Jay Shrager and Carole B. Shrager (“Plaintiffs”) and Defendant BSI Financial  
25 Services (“BSI”), by and through their respective counsel of record, hereby stipulate and agree as  
follows:

26 1. WHEREAS on September 13, 2016, this court entered the Joint Stipulation and Order to  
27 Stay Proceedings for Sixty Days.

28 2. WHEREAS the parties are engaged in active settlement negotiations to resolve the  
litigation.

1           3.       WHEREAS the parties agree to extend the stay through January 5, 2017.

2           **IT IS THEREFORE STIPULATED AND AGREED:**

3           1.       This action is hereby stayed through January 5, 2017. This stay applies to motions,  
4       pleadings, briefings, hearings, appearances, discovery, and any other deadlines imposed by law or this  
5       Court.

6           2.       BSI agrees to postpone any foreclosure proceedings with respect to the Property  
7       pending a potential resolution of the parties' dispute.

8           3.       Plaintiffs understand that BSI has made no guarantee that the parties will be able to  
9       reach a resolution and that BSI is under no obligation to reach such a resolution.

10          4.       Should the parties be unable to reach an amicable resolution after expiration January 5,  
11       2016, the parties further stipulate and agree that Plaintiffs and BSI shall each have 20 days from the  
12       expiration of the 60-day deadline to file their Motion to Remand and Motion to Dismiss, respectively.

13           ///

14           ///

15           ///

1       5. The parties further stipulate and agree that the stay requested herein is not requested for  
2 purposes of delay and will not result in any prejudice to the parties or the Court.  
3

4

5 **IT IS SO STIPULATED.**

6

7 DATED: December 30, 2016

8

9 ZIEVE, BRODNAX & STEELE, LLP

10

11 By: /s/ Benjamin D. Petiprin  
12 Benjamin D. Petiprin, Esq.  
13 Attorneys for Defendant  
14 BSI Financial Services

15 DATED: December 30, 2016

16 JENNINGS & FULTON, LTD

17 By: /s/ Adam Fulton  
18 Adam R. Fulton, Esq.  
19 Attorneys for Plaintiffs  
20 Jay Shrager and Carole B. Shrager

21

22 **ORDER**

23

24 **IT IS SO ORDERED.**



25

26 **UNITED STATES MAGISTRATE JUDGE**

27

28       1-3-2017  
29 **DATED:** \_\_\_\_\_

## CERTIFICATE OF MAILING

**I HEREBY CERTIFY** that I am an employee of Zieve, Brodnax & Steele, LLP, and not a party to nor interested in the within matter; that on the 30<sup>th</sup> day of December, 2016, service of the **JOINT STIPULATION AND ORDER TO STAY PROCEEDINGS UNTIL JANUARY 5, 2017** was made by:

(X) by serving the following parties electronically through CM/ECF/WIZNET as set forth below;

( ) by depositing a copy in the United States Mail postage prepaid to the parties listed below:

Jared B. Jennings, Esq.  
6465 West Sahara Avenue, Suite 103  
Las Vegas, NV 89146  
*Attorney for Jay Shrager and Carole B. Shrager*

*/s/ Michele Dapello*

Michele Dapello, an employee of  
Zieve, Brodnax & Steele, LLP